



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1 - NEW ENGLAND
5 POST OFFICE SQUARE - SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

December 30, 2013

Diagraph Corporation
James Brigham, President
1 Missouri Research Park Drive
St. Charles, MO 63304-5685

Re: Request for Information Pursuant to Section 104(e) of CERCLA
Higganum Cove Site, Haddam, Connecticut

Dear Mr. Brigham:

This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Higganum Cove Superfund Site in Haddam, Connecticut ("Site").

The United States Environmental Protection Agency ("EPA") is conducting a removal action at the Site and is seeking information concerning those persons responsible for the contamination at the Site and their ability to reimburse EPA for its response costs.

EPA believes that Diagraph Corporation acquired Frismar, Inc., a former owner/operator of the Site, and may have information about the Site (see enclosed December 13, 2013 letter from Mallace Industries Corporation). Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in the Enclosures to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request within **thirty (30) days** of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to thirty-seven thousand five hundred dollars (\$37,500) for each day of non-compliance.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I - New England
5 Post Office Square - Suite 100
Boston, Massachusetts 02109-3912

GENERAL NOTICE LETTER
URGENT LEGAL MATTER
PROMPT REPLY NECESSARY
VIA UPS NEXT DAY DELIVERY

JAN 06 2014

Massachusetts Electric Company
c/o Kim Herman Goslant, Esq., Senior Counsel
National Grid
40 Sylvan Road
Waltham, MA 02451
kim.goslant@nationalgrid.com

Re: General Notice Letter for the **Peabody Street Asbestos Superfund Site ("Site")** in Salem, MA and Demand for Reimbursement of Costs Expended at the Site

Dear Ms. Herman Goslant:

The U.S. Environmental Protection Agency ("EPA") has received and reviewed the Massachusetts Electric Company's ("MEC") December 17, 2012 response to EPA's October 18, 2012 Information Request, which was sent to MEC in connection with the Peabody Street Asbestos Superfund Site ("the Site") located in Salem, MA. Based on MEC's response and other available information, EPA has determined that MEC may be responsible under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), commonly known as the federal "Superfund" law, for costs EPA has incurred in cleaning up the Site.

Explanation of Potential Liability

Under CERCLA, specifically Sections 106(a) and 107(a), potentially responsible parties ("PRPs") may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be responsible for costs incurred by EPA in cleaning up the Site, unless the PRP can show divisibility or any of the other statutory defenses. PRPs include current and former owners and operators of a Site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

Based on the information collected, EPA believes that MEC may be liable under Section 107(a) of CERCLA with respect to the Peabody Street Asbestos Superfund Site



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URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

February 4, 2014

Stephen P. Lynch, Jr., President
J. H. Lynch & Sons, Inc.
50 Lynch Place
Cumberland, Rhode Island 02864

Re: **Notice of Potential Liability and Supplemental Request for Information** Pursuant to
Section 104 of CERCLA at Operable Unit Two of the Peterson/Puritan, Inc. Superfund
Site which includes the J.M. Mills Landfill in Cumberland, Rhode Island.

Dear Mr. Lynch:

This letter serves to formally notify J. H. Lynch & Sons, Inc. ("J. H. Lynch") of the potential liability which they have or may have incurred at Operable Unit Two ("OU 2") of the Peterson/Puritan, Inc. Superfund Site which includes the J.M. Mills Landfill, in Cumberland, Rhode Island ("Site"). In addition, this letter requests that you pay certain costs related to the Site and that you prepare to participate in the conduct or financing of certain clean-up activities at the Site. This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and clean-up of, the Site.

NOTICE OF POTENTIAL LIABILITY

The United States Environmental Protection Agency ("EPA") has documented the release or threatened release of hazardous substances, pollutants or contaminants at the Site. Under Sections 106(a) and 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9606(a) and 9607(a) ("CERCLA"), and other laws, responsible parties may be obligated to undertake actions deemed necessary by EPA to protect the public health, welfare or environment. Responsible parties may also be liable for all costs incurred by the government in responding to any release or threatened release at the Site. Such costs may include, but are not limited to, expenditures for investigation, planning, clean-up response and enforcement activities. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the costs to assess such damages. Responsible parties under CERCLA include persons who are current or former owners and/or operators of a site, persons who arranged for disposal of hazardous substances at a site, or persons who accepted hazardous substances for transport to a site selected by such persons.



SDMS Doc ID 526864



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URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

February 4, 2014

Philip A. Hunt Chemical Corporation
c/o Olin Corporation
Joseph D. Rupp, President
190 Carondelet Plaza, Suite 1530
Clayton, MO 63105-3443

Re: **Notice of Potential Liability and Request for Information** Pursuant to Section 104 of CERCLA at Operable Unit Two of the Peterson/Puritan, Inc. Superfund Site which includes the J.M. Mills Landfill in Cumberland, Rhode Island.

Dear Mr. Rupp:

This letter serves to formally notify the Olin Corporation ("Olin") of the potential liability which it has or may have incurred with respect to the Philip A. Hunt Chemical Corporation ("Hunt Chemical") at Operable Unit Two ("OU 2") of the Peterson/Puritan, Inc. Superfund Site which includes the J.M. Mills Landfill, in Cumberland, Rhode Island ("Site"). In addition, this letter requests that you pay certain costs related to the Site and that you prepare to participate in the conduct or financing of certain clean-up activities at the Site. This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and clean-up of, the Site.

NOTICE OF POTENTIAL LIABILITY

The United States Environmental Protection Agency ("EPA") has documented the release or threatened release of hazardous substances, pollutants or contaminants at the Site. Under Sections 106(a) and 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9606(a) and 9607(a) ("CERCLA"), and other laws, responsible parties may be obligated to undertake actions deemed necessary by EPA to protect the public health, welfare or environment. Responsible parties may also be liable for all costs incurred by the government in responding to any release or threatened release at the Site. Such costs may include, but are not limited to, expenditures for investigation, planning, clean-up response and enforcement activities. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the costs to assess such damages.



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URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
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February 4, 2014

The North Terminal Company
Division of Olin Corporation
c/o Olin Corporation
Joseph D. Rupp, President
190 Carondelet Plaza, Suite 1530
Clayton, MO 63105-3443

Re: **Notice of Potential Liability and Request for Information** Pursuant to Section 104 of CERCLA at Operable Unit Two of the Peterson/Puritan, Inc. Superfund Site which includes the J.M. Mills Landfill in Cumberland, Rhode Island.

Dear Mr. Rupp:

This letter serves to formally notify the Olin Corporation ("Olin") of the potential liability which it has or may have incurred with respect to The North Terminal Company, Division of Olin Corporation ("North Terminal") at Operable Unit Two ("OU 2") of the Peterson/Puritan, Inc. Superfund Site which includes the J.M. Mills Landfill, in Cumberland, Rhode Island ("Site"). In addition, this letter requests that you pay certain costs related to the Site and that you prepare to participate in the conduct or financing of certain clean-up activities at the Site. This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and clean-up of, the Site.

NOTICE OF POTENTIAL LIABILITY

The United States Environmental Protection Agency ("EPA") has documented the release or threatened release of hazardous substances, pollutants or contaminants at the Site. Under Sections 106(a) and 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9606(a) and 9607(a) ("CERCLA"), and other laws, responsible parties may be obligated to undertake actions deemed necessary by EPA to protect the public health, welfare or environment. Responsible parties may also be liable for all costs incurred by the government in responding to any release or threatened release at the Site. Such costs may include, but are not limited to, expenditures for investigation, planning, clean-up response and enforcement activities. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the costs to assess such damages.



SDMS Doc ID 526866



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URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
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February 24, 2014

Bradley Todd, Inc.
Peaco Todd, President
12 Carter Terrace
Somerville, MA 02143

Re: Request for Information Pursuant to Section 104(e) of CERCLA
Navy Yard Mills Site, Dracut, Massachusetts

Dear Mr. Todd:

This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Navy Yard Mills Superfund Site in Dracut, Massachusetts ("Site").

The United States Environmental Protection Agency ("EPA") has conducted a removal action at the Site and is seeking information concerning those persons responsible for the contamination at the Site and their ability to reimburse EPA for its response costs.

It is EPA's understanding that Bradley Todd, Inc. was an environmental consultant of United Circuits, Inc. and may have information relevant to the Site.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in the Enclosures to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request within **thirty (30) days** of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to thirty-seven thousand five hundred dollars (\$37,500) for each day of non-compliance.



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URGENT LEGAL MATTER - PROMPT REPLY NECESSARY
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February 28, 2014

Paul L. Oostburg Sanz, Esq.
General Counsel
Department of the Navy
Office of the General Counsel
1000 Navy Pentagon
Room 4E782
Washington, DC 20350-1000

Re: Request for Information Pursuant to Section 104 of CERCLA for Scovill Industrial Landfill
Superfund Site, Waterbury, Connecticut

Dear Mr. Oostburg Sanz:

The United States Environmental Protection Agency - Region I ("EPA") seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Scovill Industrial Landfill Superfund Site, located in Waterbury, Connecticut (the "Site").

EPA is investigating the release of hazardous substances, pollutants, and contaminants at the Site. This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to or generated, treated, stored, or disposed of at the Site. EPA is also seeking information concerning those persons responsible for the cleanup of the Site and their ability to finance that cleanup.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(c), you are hereby requested to respond to the Information Request set forth in the Enclosure to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request within **thirty (30)** of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(c) of CERCLA.



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URGENT LEGAL MATTER – PROMPT REPLY NECESSARY
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February 28, 2014

Brad R. Carson, Esq.
General Counsel of the Department of the Army
Office of the Army General Counsel
104 Army Pentagon
Washington, DC 20310-0104

Re: Request for Information Pursuant to Section 104 of CERCLA for Scovill Industrial Landfill
Superfund Site, Waterbury, Connecticut

Dear Mr. Carson:

The United States Environmental Protection Agency – Region I (“EPA”) seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Scovill Industrial Landfill Superfund Site, located in Waterbury, Connecticut (the “Site”).

EPA is investigating the release of hazardous substances, pollutants, and contaminants at the Site. This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to or generated, treated, stored, or disposed of at the Site. EPA is also seeking information concerning those persons responsible for the cleanup of the Site and their ability to finance that cleanup.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(c), you are hereby requested to respond to the Information Request set forth in the Enclosure to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request within **thirty (30)** of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA.

Please note that responses which are incomplete, ambiguous, or evasive will be treated as complete non-compliance with this Information Request. Also, be further advised that provision



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square - Suite 100
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BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED, AND ELECTRONIC MAIL

March 25, 2014

Gould Electronics, Inc.
c/o John A. Rego, Esq.
Jones Day
North Point
901 Lakeside Avenue
Cleveland, OH 44114-1190
jreg@jonesday.com

Re: Supplemental Information Request, Pursuant to Section 104 of CERCLA for
New Hampshire Dioxane Site, Atkinson, New Hampshire

Dear Mr. Rego:

This Information Request letter serves to follow-up on Gould Electronics, Inc.'s ("GEI") response, dated September 6, 2013, to the U.S. Environmental Protection Agency's ("EPA") Information Request, dated July 22, 2013, concerning the New Hampshire Dioxane Site, located in Atkinson, New Hampshire (the "Information Request").

EPA seeks to clarify its understanding of GEI's response and requires additional information. Within thirty (30) days of your receipt of this letter, please provide responses to the following questions:

1. Please provide a copy of all documents evidencing Gould-Ohio's loan(s) of \$23 million to Johnson and Johnston Associates, Inc. ("JJA") between 2000 and 2002.
2. Please explain in detail any loans and/or other reasons for, and include documentation relating to, the \$36 million debt owed by JJA to GEI as of February 2005, as indicated by GEI's answer to Question 2.i.v. of the Information Request. (EPA assumes that when GEI refers to debts owed to GEI in 2005, that it means debts owed to Nikko Materials USA (Nikko USA) or Nikko USA d/b/a Gould Electronics, Inc. because Nikko USA changed its name to GEI in February 2006. Please verify this assumption.)